

Sander L. Esserman (Admitted *Pro Hac Vice*)
Robert T. Brousseau (Admitted *Pro Hac Vice*)
Peter C. D'Apice
Jo E. Hartwick (Admitted *Pro Hac Vice*)
STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA,
A PROFESSIONAL CORPORATION
2323 Bryan Street, Suite 2200
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COUNSEL FOR AD HOC COMMITTEE OF
ASBESTOS PERSONAL INJURY CLAIMANTS

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|---------------------------------------|---|-------------------------|
| -----X |) | |
| In re |) | Chapter 11 |
| |) | |
| GENERAL MOTORS CORP., <i>et al.</i> , |) | |
| |) | Case No. 09-50026 (REG) |
| |) | |
| Debtors. |) | Jointly Administered |
| -----X | | |

**VERIFIED STATEMENT OF STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA, A PROFESSIONAL CORPORATION,
PURSUANT TO RULE 2019 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

STUTZMAN, BROMBERG, ESSERMAN & PLIFKA, A Professional
Corporation ("SBEP") files this Verified Statement Pursuant to Federal Rule
of Bankruptcy Procedure 2019 ("Verified Statement"), and represents as
follows:

1. SBEP has been retained to represent the Ad Hoc Committee of
Asbestos Personal Injury Claimants which is comprised of the following:

- (a) Terry Roth, lung cancer claimant
c/o Brayton Purcell, LLP
222 Rush Landing Road
Novato, CA 94948
- (b) Maureen Tavaglione, wrongful death claimant
c/o Waters & Kraus
3219 McKinney Avenue
Dallas, TX 75204
- (c) Edward Levitch, mesothelioma claimant
c/o Paul & Hanley LLP
1608 Fourth Street
Suite 300
Berkeley, CA 94710
- (d) William J. Lewis, mesothelioma claimant
c/o SimmmonsCooper LLC
707 Berkshire Boulevard
East Alton, IL 62024
- (e) Kenneth Knight, mesothelioma claimant
c/o The Lanier Law Firm
6810 FM 1960 West
Houston, TX 77069
- (f) Jene Moore, Sr., mesothelioma claimant
c/o Early Ludwick
Sweeney & Strauss L.L.C.
One Century Tower, 265 Church Street
New Haven, CT 06508-1866
- (g) Mark Buttita, wrongful death claimant
c/o Cooney & Conway
120 N. LaSalle Street, 30th Floor
Chicago, IL 60602
Ex Officio Member

(h) Steven Kazan
Kazan, McClain, Lyons, Greenwood & Harley,
A Professional Corporation
171 12th Street, Third Floor
Oakland, CA 94607
Ex Officio Member

2. As noted above, the individual claimants have claims against the Debtors arising from diagnoses from asbestos-related diseases caused by exposure to asbestos for which the Debtors are liable or represent the estates of decedents who died as a result asbestos-related diseases caused by exposure to asbestos for which the Debtors are liable.

3. The undersigned hereby verifies that the above information is true and correct. SBEP reserves the right to amend this Verified Statement as necessary and will promptly supplement this Verified Statement to the extent any material changes occur in the facts set forth herein.

Dated: June 24, 2009

/s/ Sander L. Esserman
Sander L. Esserman (Admitted *Pro Hac vice*)
Robert T. Brousseau (Admitted *Pro Hac Vice*)
Peter C. D'Apice
Jo E. Hartwick (Admitted *Pro Hac Vice*)

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**ATTORNEYS FOR THE
AD HOC COMMITTEE OF
ASBESTOS PERSONAL
INJURY CLAIMANTS**

I verify under penalty of perjury that the foregoing statements are true
and correct to the best of my knowledge, information and belief.

Date: June 24, 2009
Dallas, Texas

/s/ Sander L. Esserman
Sander L. Esserman